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6 Attorneys for the Plaintiffs' Executive
7 Committee appointed by the Superior
Court of the State of California, in and for
the County of Alameda, in Case No.
RG16843631 and related cases.

8 THE UNITED STATES BANKRUPTCY COURT
9 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

10 **In re:**

11 **PG&E CORPORATION,**

12 -and-

13 **In re:**

14 **PACIFIC GAS AND ELECTRIC COMPANY,**

15 Debtors.

16 Affects PG&E Corporation

17 Affects Pacific Gas and Electric Company

18 Affects both Debtors

) Case Nos. 19-30088 (DM)

) Chapter 11

) **JOINDER IN MOTION FOR RELIEF
FROM AUTOMATIC STAY IN
CONNECTION WITH THE GHOST
SHIP FIRE CLAIMS**

) DATE: December 17, 2019
TIME: 10:00 a.m.
PLACE: Courtroom 17
450 Golden Gate Avenue,
16th Fl.
San Francisco, California

) JUDGE: Hon. Dennis Montali

) RELATED DOCKETS: 4875-4879

19 * All papers shall be filed in the lead case, No.
20 19-30088(DM)

21 Plaintiffs in the Ghost Ship Fire Cases who are also Fire Victim Claimants, whose names
22 are set forth below (hereinafter collectively referred to as the "Ghost Ship Claimants"), by and
23 through their attorneys of record, do hereby respectfully submit the following Joinder in Motion

for Relief from Automatic Stay in Connection with the Ghost Ship Fire Claims (the “Joinder”).

I. **INTRODUCTION**

On November 26, 2019, the Plaintiffs’ Executive Committee appointed by the Superior Court of the State of California, County of Alameda, in Case No. RG16843631 and related cases (the “Ghost Ship Executive Committee”) filed a Motion for Relief from the Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Post Trial Matters in Connection with the Ghost Ship Fire Cases (the “Motion for Relief from the Automatic Stay”) (Dkt. 4875).

The signatories below are the counsel for the various plaintiffs in the *In re Ghost Ship Fire Litigation*, Case No. RG16843631 (And Related Cases).

II. **JOINDER**

The Ghost Ship Claimants, named below, join as moving parties in the Motion for Relief from the Automatic Stay:

1. David Gregory, individually, as Personal Representative of the Estate of Michela Gregory, and as Successor in Interest of Michela Gregory; Kimberly Gregory, individually and as Successor in Interest to Michela Gregory; and Estate of Michela Gregory; and
 2. Lesley Moran, as Guardian Ad Litem to A.G. and LG., minors, Individually and as Successors in Interest of Alex Ghassan; Lesley Moran as Personal Representative of the Estate of Alex Ghassan; and the Estate of Alex Ghassan; and
 3. Janet Barmby, Individually, as Personal Representative of the Estate of Jennifer Mendiola, and as Successor in Interest of Jennifer Mendiola; John Barmby, Individually and as Successor in Interest of Jennifer Mendiola; Jean-Thierry Mendiola, Individually and as Successor in Interest of Jennifer Mendiola; and Estate of Jennifer Mendiola; and
 4. Ivannia Chavarria, Individually, as Personal Representative of the Estate of Brandon Wittenauer, and as Successor in Interest of Brandon Wittenauer; and Estate of Brandon Wittenauer; and

- 1 5. Bruce Fritz, Individually, as Personal Representative of the Estate of Justin
2 Fritz (also known as Riley Fritz), and as Successor in Interest of Justin Fritz
3 (also known as Riley Fritz); Nancye Fritz, Individually and as Successor in
4 Interest of Justin Fritz (also known as Riley Fritz); and Estate of Justin Fritz
5 (also known as Riley Fritz); and
- 6 6. Natalie Jahanbani, Individually, as Personal Representative of the Estate of
7 Matthew Bohlka (also known as EM Bohlka), and as Successor in Interest of
8 Matthew Bohlka (also known as EM Bohlka); and Estate of Matthew Bohlka
9 (also known as EM Bohlka); and
- 10 7. Mason Dixon, Successor in Interest to John Dixon, as heir to the Estate of
11 William Dixon; and the Estate of William Dixon; and
- 12 8. Andrew Kershaw, Individually, as Personal Representative of the Estate of
13 Amanda Kershaw, and as Successor in Interest of Amanda Kershaw; Linda
14 Regan, Individually and as Successor in Interest of Amanda Kershaw; Paul
15 Allen, Individually and as Successor in Interest of Amanda Kershaw; and
16 Estate of Amanda Kershaw; and
- 17 9. Michael Madden, Individually, as Personal Representative of the Estate of
18 Griffin Madden, and as Successor in Interest of Griffin Madden; Catherine
19 Madden, Individually and as Successor in Interest of Griffin Madden; and
20 Estate of Griffin Madden; and
- 21 10. Michael Morris, Individually, as Personal Representative of the Estate of
22 Jennifer Morris, and as Successor in Interest of Jennifer Morris; Toshiko
23 Morris, Individually and as Successor in Interest of Jennifer Morris; and Estate
24 of Jennifer Morris; and
- 25 11. Gretchen Porter, Individually, as Personal Representative of the Estate of
26 William Dixon, and as Successor in Interest of William Dixon; and Estate of
27 William Dixon; and
- 28 12. Susan Slocum¹, Individually, as Personal Representative of the Estate of
29 Donna Kellogg, and as Successor in Interest of Donna Kellogg; and Estate of
30 Donna Kellogg; and
- 31 13. Court Tanouye, Individually, as Personal Representative of the Estate of
32 Jennifer Tanouye, and as Successor in Interest of Jennifer Tanouye; Tomoko
33 Tanouye, Individually and as Successor in Interest of Jennifer Tanouye; and
34 Estate of Jennifer Tanouye; and
- 35 14. Edward Wadsworth, Individually, as Personal Representative of the Estate of
36 Peter Wadsworth, and as Successor in Interest of Peter Wadsworth; Suzanne
37 Wadsworth, Individually and as Successor in Interest of Peter Wadsworth; and
38 Estate of Peter Wadsworth; and
- 39 15. Brian Hough, an individual, and as successor-in-interest to Travis Hough; Judy
40 Hough, an individual, and as successor-in-interest to Travis Hough ; and

¹ Ms. Slocum is a member of the Official Committee of Tort Claimants in the above captioned jointly administered cases.

- 1 16. Carol Cidlak, an individual, and as successor-in-interest to Nicole Siegrist; and
- 2 17. John Georges Igaz, an individual, and as successor-in-interest to John Nicholas
3 Igaz; and
- 4 18. Richard Runnels, an individual, and as successor-in-interest to Benjamin
5 Runnels; Lorraine Runnels, an individual, and as successor-in-interest to
6 Benjamin Runnels; and
- 7 19. Colleen Dolan, Individually and as Personal Representative of the Estate of
8 Chelsea Dolan; and
- 9 20. Rodney Clark, Individually and as Personal Representative of the Estate of
10 Barrett Clark; and
- 11 21. Tamra McGill, Individually, as a Personal Representative of the Estate of
12 Draven McGill, and as Successor in Interest of Draven McGill; and Phillip
13 McGill, Individually; and
- 14 22. Maria Vega, individually and as heir to Alex Vega, deceased; Manuel Vega,
15 individually and as heir to Alex Vega, deceased; and Maria Vega and Manuel
16 Vega as co-representatives of the Estate of Alex Vega; and
- 17 23. James and Deborah Walrath, individually and as heir to Nicholas Walrath,
18 deceased; and James and Deborah Walrath as co-representatives of the Estate
19 of Nicholas Walrath; and
- 20 24. Dennis Cline, individually and as heir to David Riley Cline, deceased; Kerry
21 Cline, individually and as heir to David Riley Cline, deceased; and Dennis
22 Cline and Kerry Cline as co-representatives of the Estate of David Riley Cline;
23 and
- 24 25. Christopher Askew, Individually and as Successor in Interest of Cash Askew;
25 and
- 26 26. Jack Bohlka, Individually and as Personal Representative of the Estate of
27 Matthew Bohlka (also known as Em Bohlka) and as Successor in Interest of
28 Matthew Bohlka (also known as Em Bohlka); and
- 29 27. Margaret Bohlka, individually and as heir to Matthew Andrew Bohlka aka Em
30 Bohlka, deceased; and
- 31 28. Gene McCarty and Colleen McCarty, Individually and as Personal
32 Representatives of the Estate of Jason McCarty; and
- 33 29. Yrjo Timonen and Kirsi Piha-Timonen, Individually and as Successors in
34 Interest to Hanna Ruax; and
- 35 30. Gary Plotkin and Valerie Plotkin, Individually and as Successors in Interest to
36 Vanessa Plotkin; and

26 ///

- 1 31. Robert E. Lapine, Individually, and as Successor-in-Interest to Edmond W.
2 Lapine, II, Deceased; and
3 32. John Matlock, individually, and as successor-in-interest to Joseph Hudson
4 Matlock, Deceased; and
5 33. Kathe Matlock, individually, and as successor-in-interest to Joseph Hudson
6 Matlock, Deceased; and
7 34. Randall Wittenauer, individually, and as successor-in-interest to Brandon
8 Chase Wittenauer, Deceased; and
9 35. Yraina L. Kopelman, individually, and as successor-in-interest to Edmond
10 William Lapine, II, Deceased; and
11 36. George D. Kellogg, individually And on behalf of Donna Kellogg, Deceased;
12 37. Christopher Danemayer, Individually and as Successor in Interest of Micah
13 Krueger Danemayer; and Pamela Krueger, Individually and as Successor in
14 Interest of Micah Krueger Danemayer; and
15 38. Yoo Sook Jo, Individually and as Successor in Interest of Ara Christina Jo; and
16 Caleb Seong Jo, Individually and as Successor in Interest of Ara Christina Jo;
17 and
18 39. Farzaneh Farsoudi-Hoda, individually and as heir to Sara Hoda, deceased; and
19 40. Leisa Askew, individually and as heir of Cash Askew, deceased; and
20 41. Jeffrey Sylvan and Ursula Sylvan, Individually and as Successors in Interest of
21 Michele Marie Sylvan; and
22 42. Samuel Maxwell²; and
23 43. Anthony Perrault; and
24 44. Aaron Marin; and
25 45. Benjamin Langfur; and
26 46. Emilie Grandchamps; and
27 47. Robert Jacobitz; and
28 48. Jose Avalos; and
29 49. Carmen Brito; and

² Mr. Maxwell is a member of the Official Committee of Tort Claimants in the above captioned jointly administered cases.

- 1 50. David Calvera; and
2 51. Adam Kennon; and
3 52. Hunter Morton; and
4 53. Andrew Ruiz; and
5 54. Michael Russell; and
6 55. Leah Vega; and
7 56. Nicole Kelber.

8 The Motion for Relief from the Automatic Stay sets forth the reasons why this Court
9 should grant relief from automatic stay. The Ghost Ship Claimants hereby fully incorporate, by
10 reference, the arguments set forth in the Motion for Relief from the Automatic Stay, as if fully
11 set forth herein.

12 The Ghost Ship Claimants have been waiting three years for justice. Many lost their
13 children, who were struck down in the prime of their lives. Some of the claimants lost their
14 homes. Two little girls, who were only 4 years old at that time, lost their father. One was
15 horribly injured and will require 24 hour attendant care for the rest of his life. Justice delayed is
16 justice denied and the Ghost Ship Claimants will receive no justice and no resolution, in this
17 Court. These victims deserve closure.

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III.

CONCLUSION

For all the foregoing reasons, the Ghost Ship Claimants respectfully request that this Court grant the Motion for Relief from the Automatic Stay.

Date: December 7, 2019

Respectfully Submitted,

MARY ALEXANDER & ASSOCIATES, P.C.

By: /s/Mary E. Alexander

Mary E. Alexander,
Plaintiffs Liaison Counsel and Attorneys for
David gregory, Kimberly Gregory, Jose
Avalos, Janet Barmby, John Barmby,
Jean-Thierry Mendiola, Carmen Brito, David
Calvera, Ivannia Chavarria, Bruce Fritz,
Nancye Fritz, Alexandria Ghassan and
Lucienne Ghassan, by and through their
Guardian ad Litem, Lesley Moran, Natalie
Jahanbani, Adam Kennon, Andrew Kershaw,
Linda Regan, Paul Allen, Michael
Madden, Catherine Madden, Michael Morris,
Toshiko Morris, Hunter Morton, Gretchen
Porter, Andrew Ruiz, Michael Russell, Susan
Slocum Court Tanouye, Tomoko Tanouye, Leah
Vega, Edward Wadsworth and Suzanne
Wadsworth.

Date: December 9, 2019

Respectfully Submitted,

DOLAN LAW FIRM PC

By: /s/*Arsen Sarapinian*

Arsen Sarapinian, Esq.,
Attorneys for Plaintiffs Carol Cidlak, Brian
Hough, Judy Hough, John Georges Igaz,
Richard Runnels, and Lorraine Runnels.

SIGNATURES CONTINUE ON THE NEXT PAGE

1 Date: December 7, 2019

Respectfully Submitted,

2
3
THE BRANDI LAW FIRM

4 By: /s/Thomas Brandi

5 Thomas Brandi, Esq.,
6 Attorneys for Plaintiffs Rodney Clark and
Colleen Dolan.

7 Date: December 7, 2019

Respectfully Submitted,

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9
**DREYER BABICH BUCCOLA WOOD
CAMPORA, LLP**

10 By: /s/Robert B. Bale

11 Robert B. Bale, Esq.,
12 Attorneys for Plaintiffs Dennis Cline, Kerry
Cline, Tamra McGill, Phillip McGill, Maria
Vega, Manuel Vega, James Walrath, and
Deborah Walrath.

14 Date: December 7, 2019

Respectfully Submitted,

15
16
KAUPP & FEINBERG

17 By: /s/W. Gordon Kaupp

18 W. Gordon Kaupp, Esq.
Attorneys for Plaintiff Samuel Maxwell

19 Date: December 9, 2019

Respectfully Submitted,

20
21
RIBERA LAW FIRM

22 By: /s/Sandra Ribera Speed

23 Sandra Ribera Speed, Esq.
24 Attorneys for Plaintiff Christopher Askew

25 *SIGNATURES CONTINUE ON THE NEXT PAGE*

1 Date: December 7, 2019

Respectfully Submitted,

2
3
**LAW OFFICE OF JOSHUA COHEN
SLATKIN**

4 By: /s/Joshua Cohen Slatkin
5 Joshua Cohen Slatkin, Esq.
6 Attorneys for Plaintiff Jack Bohlka

7 Date: December 7, 2019

Respectfully Submitted,

8
**THON BECK VANNI CALLAHAN &
POWELL**

9 By: /s/Raffi H. Ohanian
10 Raffi H. Ohanian, Esq.
11 Attorneys for Plaintiff Margaret Bohlka

12 Date: December 7, 2019

Respectfully Submitted,

13
GIRARDI KEESE

14
15 By: /s/Arin Scapa
16 Arin Scapa, Esq.
17 Attorneys for Plaintiffs Emilie
18 Grandchamps, individually and as successor in
19 interest of Alex Ghassan, Robert Jacobitz,
Benjamin Langfur, Aaron Marin, Gene
McCarty, Colleen McCarty, Yrjo Timonen,
Kirsi Piha-Timonen

20 Date: December 8, 2019

Respectfully Submitted,

21
THE ARNS LAW FIRM

22
23 By: /s/Robert C. Foss
24 Robert C. Foss, Esq.
25 Attorneys for Plaintiffs Gary Plotkin and
26 Valerie Plotkin

SIGNATURES CONTINUE ON THE NEXT PAGE

1 Date: December 7, 2019

Respectfully Submitted,

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4
BAUM HEDLUND ARISTEI GOLDMAN, PC

5 By: /s/Clay Robbins, III

6 Clay Robbins, III, Esq.

Attorneys for Plaintiff Robert Lapine

7 Date: December 7, 2019

8 Respectfully Submitted,

9
10
LAW OFFICE OF JOHN R. BROWNE, III

11 By: /s/John R. Browne, III

12 John R. Browne, III, Esq.

13 Attorneys for Plaintiff George Kellogg

14 Date: December 7, 2019

15 Respectfully Submitted,

16
17
ROUDA FEDER TIETJEN MCGUINN

18 By: /s/ John M. Feeder

19 John M. Feder , Esq.

20 Attorneys for Plaintiffs Christopher
21 Danemeyer and Pamela Krueger

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SIGNATURES CONTINUE ON THE NEXT PAGE

1 Date: December 8, 2019

Respectfully Submitted,

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4
LAW OFFICES OF DO KIM APLC

5 By: /s/Do Kim

6 Do Kim, Esq.

7 Attorneys for Plaintiffs Yoo Sook Jo and
Caleb Seong Jo

8 Date: December 7, 2019

Respectfully Submitted,

9
10 **SIEGEL & YEE**

11 By: /s/Dan Siegel

12 Dan Siegel, Esq.

13 Attorneys for Plaintiff Farzaneh Farsoudi-
Hoda

14 Date: December 7, 2019

15 Respectfully Submitted,

16
17 **LIUZZI MURPHY SOLOMON CHURTON &**
HALE, LLP

18 By: /s/David L. Winnett

19 David L. Winnett, Esq.

20 Attorneys for Plaintiff Leisa Askew

21
22
23 *SIGNATURES CONTINUE ON THE NEXT PAGE*

24
25
26

1 Date: December 7, 2019

Respectfully Submitted,

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4
LAW OFFICE OF PAUL L. ALAGA

5 By: /s/Paul L. Alaga

6 Paul L. Alaga, Esq.

Attorneys for Plaintiff Anthony Perrault

7 Date: December 7, 2019

8 Respectfully Submitted,

9
10
LAW OFFICE OF RANDAL BLAIR

11 By: /s/Randal F. Blair

12 Randal F. Blair, Esq.

13 Attorneys for Plaintiffs Jeffrey Sylvan and
Ursula Sylvan

14 Date: December 7, 2019

15 Respectfully Submitted,

16
17
FOIRE ACHERMANN

18 By: /s/Sophia M. Achermann

19 Sophia M. Achermann, Esq.

20 Attorneys for Plaintiff Nicole Kelber

21 Date: December 7, 2019

22 Respectfully Submitted,

23
24
THE MATIASIC FIRM, P.C.

25 By: /s/Paul A. Matiasic

26 Paul A. Matiasic, Esq.

Attorneys for Plaintiffs Yraina
Kopelman, Kathe Matlock, John Matlock and
Randall Wittenauer.

1
2 The Ghost Ship Executive Committee supports this joinder to its Motion.
3
4

5 Date: December 9, 2019

Respectfully submitted,

6 **PINO & ASSOCIATES**

7
8 By:/s/Estela O. Pino

9 Estela O. Pino, Attorneys for Plaintiffs'
10 Executive Committee appointed by the Superior
11 Court of the State of California, in and for the
County of Alameda, in Case No. RG16843631
and related cases.

1 **CERTIFICATION**

2
3 In compliance with Civil Local Rule 5-1(i)(3), I attest under penalty of perjury that each
4 signatory has concurred in the filing of this document.

5 Executed on December 9, 2019, at Roseville, Placer County, California.

6
7 */s/Estela O. Pino* _____

8 Estela O. Pino

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